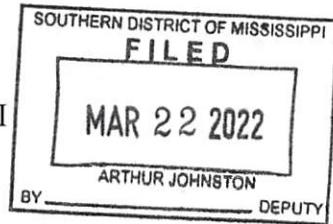


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

3:22-cr-36 KHJ-FKB

THOMAS W. DOUGLAS, JR. and
JOHN S. WELCH, SR.

MOTION TO SEAL

The United States of America requests that the Indictment and all documents filed herein be sealed, and represents the following:

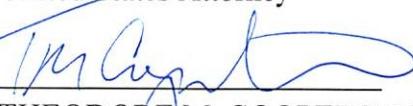
The Grand Jury has returned an Indictment against the Defendants. Revealing the existence of the file and Indictment prior to the arrest of the Defendants would jeopardize law enforcement agents and greatly impede the apprehension of the Defendants. However, the government requests that the U.S. Marshals Service and/or the United States Attorney's Office be allowed to make copies of the indictment, warrant, and any related documents available to other federal, state and local law enforcement agencies who request the same to facilitate the arrest and detention of the Defendants.

WHEREFORE, the United States requests that the Court SEAL the file and all documents filed including but not limited to the Indictment and Return, and this Motion and the Order to Seal, pending the arrest of the Defendants and that copies be distributed to law enforcement agencies as needed to facilitate the arrest and detention for the Defendants.

Respectfully submitted,

DARREN J. LAMARCA
United States Attorney

By:


THEODORE M. COOPERSTEIN
Assistant United States Attorney
Mississippi Bar No. 106208